IN THE UNITED STATES DISTRICT COURT EASTERN DISTRICT OF MISSOURI EASTERN DIVISION

UNITED STATES OF AMERICA,)
Plaintiff,	
VS.) No. 4:22 MJ 7029 (SPM)
CHUNY ANN REED))SUBMITTED TO THE COURT AND)SIGNED BY RELIABLE ELECTRONIC) MEANS
Defendant.)

MOTION FOR PRE-TRIAL DETENTION AND HEARING

Comes now the United States of America, by and through its attorneys, Sayler A.

Fleming, United States Attorney for the Eastern District of Missouri, and James C. Delworth,

Assistant United States Attorney for said District, and moves the Court to order the defendant detained pending trial, and further requests that a detention hearing be held three (3) days from the date of defendant's initial appearance before the United States Magistrate pursuant to Title 18, United States Code, Section 3141, et seq.

As and for its grounds, the Government states as follows:

1. The defendant is charged with an offense, distribution of cocaine base and fentanyl, for which a maximum term of imprisonment of not more than twenty years is prescribed in Title 21, United States Code, Sections 841(a)(1). Accordingly, a rebuttable presumption arises pursuant to Title 18, United States Code, Section 3142(e)(3) that there are no conditions or combination of conditions which will reasonably assure the appearance of the defendant as required, and the safety of any other person and the community.

 The offense involved the distribution of crack cocaine and fentanyl which led to several overdoses with at least one overdose resulting in serious bodily injury and another overdose resulting in death.

WHEREFORE, the Government requests this Court to order defendant detained prior to trial, and further to order a detention hearing three (3) days from the date of defendant's initial appearance.

Respectfully submitted,

SAYLER A. FLEMING UNITED STATES ATTORNEY

/s/ James C. Delworth

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